

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF IOWA
DIVISION**

| | |
|--|--|
| IN THE MATTER OF: Malyadri Paluri, Debtor. | CASE NO. 20-00553 MOTION TO MODIFY PLAN POST- CONFIRMATION |
|--|--|

COMES NOW the above-named Debtor, Malyadri Paluri, and for his Motion to Modify Plan Post-Confirmation states as follows:

1. The confirmed plan currently on file calls for the Debtor to make payments as follows:
 - a. \$1,205.00 per month for the remainder of the plan.
2. The confirmed plan currently on file calls for the Debtor to turn over to the Trustee for administration any realized tax refunds during the term of the chapter 13 plan.
3. The Debtor received \$4,416.00 for 2020 federal tax refunds and owed \$104.00 for 2020 state tax refunds leaving net tax refunds of \$4,312.00.
4. The Debtor proposes modifying the confirmed plan on file to retain the full amount of his 2020 tax refunds to pay for the following:
 - a. A car repair totaling \$1,201.55 as evidenced by Exhibit A.
 - b. Green Card Application, fees, and attorney fees totaling \$4,410.92 broken down as follows:
 1. Invoice 1 from Davis Brown for \$1,008.00 as evidenced by Exhibit B.
 2. Invoice 2 from Davis Brown for \$204.00 as evidenced by Exhibit C.
 3. Invoice 3 for Davis Brown for \$748.92.00 as evidenced by Exhibit D.
 4. USCIS Fee for Malyadri Paluri for \$1,225.00 as evidenced by Exhibit E.

5. USCIS Fee for Madhavi Ramana for \$1,225.00 as evidenced by Exhibit

F.

5. The Debtor further needs to purchase a vehicle for his wife so that she can have transportation to help with the children and other household issues. The Debtor is looking for a car in the \$3,000.00 range. Due to this expense, the Debtor proposes modifying the current plan on file to reduce his monthly payments by \$500.00 for six months (April 2020 – September 2020). The Debtor will pay \$705.00 for the six months with full payments resuming in October 2021.
6. All other provisions of the Plan shall remain as confirmed and not be modified.

WHEREFORE, the Debtor prays the Court approve his proposed Modified Chapter 13 Plan.

/s/ Samuel Z. Marks

Samuel Z. Marks
Marks Law Firm, P.C.
4225 University Ave.
Des Moines, IA 50311
(515) 276-7211
Fax:(515) 276-6280
Office@markslawdm.com
ATTORNEY FOR THE DEBTOR

CERTIFICATE OF SERVICE

I hereby certify that on **March 26, 2021**, a copy of **Motion to Modify Plan Post-Confirmation** was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.

| |
|-----------------------------------|
| Amex |
| Amex |
| Bank of America |
| Bank of America NA |
| Chase Card Services |
| Chase Card Services |
| Chase Card Services |
| Digital Federal Credit Union |
| Discover Bank |
| Discover Financial |
| John Lewis Kramer II |
| Matthew Frank Hrubetz |
| Matthew Frank Hrubetz |
| Matthew Murphy |
| Midland Funding |
| Midland Funding |
| Portfolio Recovery |
| Portfolio Recovery |
| Portfolio Recovery |
| Portfolio Recovery Associates LLC |
| Portfolio Recovery Associates LLC |
| Portfolio Recovery Associates LLC |

/s/ Sam Marks

Sam Marks
Marks Law Firm
4225 University Ave
Des Moines, IA 50311
515-276-7211



www.TiresPlus.com

Cust Status: Drop Off

Appt: Yes

FINAL INVOICE

W DES MOINES - 2800 UNIVERSITY AVE, WEST DES MOINES, IA. 50266-1258 - 515.222.1411

Service Advisor: 1 LUCAS

Wheel Lock:

Technician: 04 BRANDON

Customer Details:

Alt. Auth. Name & Phone:

Vehicle Details:

PAULRI, MAL
1320 42ND PLZ
APT 12
WEST DES MOINES, IA 50266-1812
515.333.3393

N/A

2013 HYUNDAI SANTA FE GLS

3.3L V6 FI GAS VIN F DOHC
VIN #: KM8SMDHF8DU001646
LIC #: BHN650 IA
MILEAGE: 76,896

| Description | Rev Hist | Article # ID | Qty | Unit Price | Extended Price | Job Total |
|--|----------|--------------|-----|------------|----------------|-----------|
| COURTESY CHECK | | 01 | | | | |
| COURTESY CHECK | | 7046930 04TS | 1 | N/C | N/C | |
| COMPLETE VEHICLE INSPECTION | | 01 | | | | 21.99 |
| VEHICLE INSPECTION | | 7028789 04TN | 1 | 21.99 | 21.99 | |
| STANDARD OIL CHANGE UP TO 5 QTS | | 01 | | | | 46.58 |
| 6.0 QTS. | | | | | | |
| API - SM, ILSAC GF-4 or Above, SAE 5W-30, 5W-40. For better fuel economy, it is recommended to use SAE 5W-30. SAE10W-30 Above 0Deg. F (-18Deg C) | | | | | | |
| The Manufacturer recommends an Oil Change based on mileage of 3750 miles...See Owner's manual for specific requirements. | | | | | | |
| PZ179 OIL FILTER | | 7009734 04TN | 1 | 4.99 | 4.99 | |
| 5W-30 QS ADV DUR GF5 OIL UP TO 5 QTS | | 7034655 04TN | 1 | 28.00 | 28.00 | |
| ADDITIONAL OIL REQUIRED 1.0 QTS @ \$0.56 PER 1/10 QTS | | 7034656 04TN | 10 | 0.56 | 5.60 | |
| USED OIL FILTER RECYCLING CHG (1) | | 7075051 04NN | 1 | 2.99 | 2.99 | |
| OIL CHANGE LABOR | | 7029718 04TS | 1 | 5.00 | 5.00 | |
| A/C EVACUATE AND RECHARGE R134A | 1,2 | 01 | | | | 137.99 |
| FILLED A/C AND SEEMS TO BE HOLDING PRESSURE. | | | | | | |
| THE LINE THAT WAS RECOMNDED IS NOT SHOWING ANY SIGNS OF DYE LEAKING. | | | | | | |
| ADV IF AC GOES OUT TO BRING BACK AND WE WILL CHECK FOR LEAK AT NO CHARGE | | | | | | |
| R134A PER POUND | | 7095451 66TN | 1 | 42.00 | 42.00 | |
| A/C SYSTEM DYE | | 7096547 66TN | 1 | 10.00 | 10.00 | |
| AIR CONDITIONING 134A SERVICE | | 7095478 66TS | 1 | 85.99 | 85.99 | |
| FIRESTONE TIRE PACKAGE | | 07 | | | | 732.60 |
| 005380 DESTINATION LE3 BL 235/60R18 103H 70,000 Mile Limited Warranty | | 005380 04TN | 4 | 156.99 | 627.96 | |
| DOT# 17X45LE314220 | | | | | | |
| DOT# 17X45LE314220 | | | | | | |
| DOT# 17X45LE314220 | | | | | | |
| DOT# 17X45LE314220 | | | | | | |
| NEW TIRE WHEEL BALANCE LABOR | | 7013632 04TS | 4 | 12.99 | 51.96 | |
| TPMS VALVE SERVICE KIT LABOR | | 7008190 04TS | 4 | 3.18 | 12.72 | |
| 6-231C TPMS KIT VS70 | | 7012743 04TN | 4 | 7.00 | 28.00 | |
| SCRAP TIRE RECYCLING FEE | | 7075078 04NN | 4 | 2.99 | 11.96 | |
| TIRE INSTALLATION | | 7015016 04TS | 4 | N/C | N/C | |
| ALIGNMENT SERVICE | | 07 | | | | 91.99 |
| STANDARD WHEEL ALIGNMENT | | 7004578 04TS | 1 | 91.99 | 91.99 | |

Information on service warranty, maintenance, and safety can be located at
<https://www.tiresplus.com/auto-repair-services/repair-service-warranty/>

Exhibit A



www.TiresPlus.com

Cust Status: Drop Off Appt: Yes

FINAL INVOICE

W DES MOINES - 2800 UNIVERSITY AVE, WEST DES MOINES, IA. 50266-1258 - 515.222.1411

| Description | Rev Hist | Unit | Extended | Job |
|----------------------------------|---------------|------|----------|-------|
| | /Article # ID | Qty | Price | Total |
| WIPER BLADE SERVICE (Front-Both) | 07 | | | 32.98 |
| 30-130 WIPER BLADE 13" | 7015128 04TN | 1 | 13.49 | |
| 30-260 WIPER BLADE 26" | 7015138 04TN | 1 | 13.49 | |
| WIPER BLADE LABOR | 7042579 04TS | 2 | 3.00 | |
| WIPER BLADES (REAR) | 07 | | | 42.99 |
| 55-130 13 TRICO REAR | 7008018 04TN | 1 | 39.99 | |
| WIPER BLADE LABOR | 7042579 04TS | 1 | 3.00 | |

ORDER NOTES

CAR IS SHAKING AND AC NOT WORKING.
RIGHT INNER TIE ROD HAS SMALL AMOUNTS OF PLAY.

All parts are new unless otherwise specified.

Payment History:

MasterCard 0938 1,201.55 262887 Sale

MID: 222220327934

Term: 0002 Card Swiped

Total Tendered 1,201.55

Summary:

Parts 816.51
Labor 290.61
Shop Supplies 17.97

Sub-Total 1,125.09

Tax (7.00%) 76.46

Total \$1,201.55

I acknowledge notice and oral approval of
a change in the original estimated price.

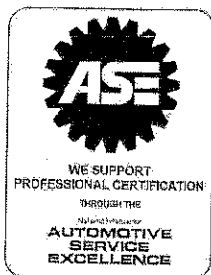
1) 03/04/2021 11:44AM -153.67 PAULRI, MAL 515.333.3393
2) 03/04/2021 12:50PM 652.89 PAULRI, MAL 515.333.3393
3) 03/05/2021 09:47AM -499.22 PAULRI, MAL 515.333.3393

Signature or Initials

Declined Work:

ESTONE TIRE PACKAGE
CONDITIONING

Information on tire warranty, maintenance, and safety can be located at
<https://www.tiresplus.com/tires/warranty-options/>
or by calling toll free 800-847-3272 to obtain a free printed copy



I have received the above goods and/or services. If this is a
credit card purchase, I agree to pay and comply with my
cardholder agreement with the issuer.

Customer Signature



MOTORIST
ASSURANCE
PROGRAM

BUILDING TRUST THROUGH STANDARDS

Information on service warranty, maintenance, and safety can be located at
<https://www.tiresplus.com/auto-repair-services/repair-service-warranty/>

In Account With

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

Attorneys and Counselors at Law
215 10th Street, Suite 1300
Des Moines, IA 50309-3993
(515) 288-2500
Federal ID. No. 42-1343884

Malyadri Paluri
1320 42nd Plaza, Apt. 12
West Des Moines, IA 50266

Statement: 1453796
Date: 11/17/2020

Re: 9003747-115331 - Immigration

For Professional Services Rendered

Professional Fees

| | | Hours |
|---------------------|---|-------------|
| 10/27/2020 EVAN | Reviewing underlying criminal history prior to filing adjustment of status application; reviewing documents from Malyadri Paluri; conferring regarding same; telephone calls with Malyadri Paluri regarding same; begin to research issue; corresponding with Malyadri Paluri; review research and confer regarding same. | 1.20 |
| 10/27/2020 DERI | Review and analyze consequences of two OWI convictions relating to adjustment of status. | 1.00 |
| 10/28/2020 DERI | Review and analyze when I-212 waiver would need to be filed. | 0.10 |
| 10/28/2020 DERI | Review and analyze waiver available if client is found inadmissible; prepare e-mail to client regarding research analysis. | 0.50 |
| 10/28/2020 EVAN | Correspond with Malyadri Paluri regarding research on criminal issue and filing of adjustment of status application. | 0.20 |
| 10/29/2020 EVAN | Conferring regarding research on criminal issue and waiver possibility for same and affidavit regarding criminal issue and bankruptcy. | 0.30 |
| 10/29/2020 LTC | Call regarding adjustment of status application. | 0.50 |
| 10/30/2020 EVAN | Correspond with Malyadri Paluri to request narrative for affidavit with I-485 application; conferring regarding same. | 0.20 |
| Total Hours: | | 4.00 |

Rate Summary

| | | |
|------------------------|---------------------------|--------|
| Lori T. Chesser | 0.50 hours at \$375.00/hr | 187.50 |
| Elizabeth S. Van Arkel | 1.90 hours at \$255.00/hr | 484.50 |
| Daniela Erickson | 1.60 hours at \$210.00/hr | 336.00 |
| Total hours: | 4.00 | |

Total Current Billing: \$1,008.00

Exhibit B



In Account With

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

Attorneys and Counselors at Law

215 10th Street, Suite 1300

Des Moines, IA 50309-3993

(515) 288-2500

Federal I.D. No. 42-1343884

Malyadri Paluri

1320 42nd Plaza, Apt. 12

West Des Moines, IA 50266

Monday, February 01, 2021

This is a reminder that the below statement(s) are past due. Unless arrangements have been made, please phone Vicki De Laria at (515) 246-7812 or email vickidelaria@davisbrownlaw.com to discuss payment options. Please note that the below total does not reflect any amounts that have been billed within the last 30 days.

| Date | Stmn No. | Matter | Amount | Paid | Balance |
|------------|----------|-----------------------|-------------------|---------------|-------------------|
| 11/17/2020 | 1453796 | Immigration | 1,008.00 | 0.00 | 1,008.00 |
| 12/16/2020 | 1456984 | Immigration | 204.00 | 0.00 | 204.00 |
| | | | <u>\$1,212.00</u> | <u>\$0.00</u> | <u>\$1,212.00</u> |
| | | Total Now Due: | | | \$1,212.00 |

Exhibit C



In Account With

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

Attorneys and Counselors at Law
215 10th Street, Suite 1300
Des Moines, IA 50309-3993
(515) 288-2500
Federal I.D. No. 42-1343884

Malyadri Paluri
1320 42nd Plaza, Apt. 12
West Des Moines, IA 50266

Monday, March 01, 2021

This is a reminder that the below statement(s) are past due. Unless arrangements have been made, please phone Vicki De Laria at (515) 246-7812 or email vickidelaria@davisbrownlaw.com to discuss payment options. Please note that the below total does not reflect any amounts that have been billed within the last 30 days.

| Date | Stmn No. | Matter | Amount | Paid | Balance |
|----------------|----------|-------------|-----------------|---------------|-----------------|
| 01/20/2021 | 1459676 | Immigration | 748.92 | 0.00 | 748.92 |
| | | | <u>\$748.92</u> | <u>\$0.00</u> | <u>\$748.92</u> |
| Total Now Due: | | | | | \$748.92 |

Exhibit D

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



| | | |
|---|--|--|
| NOTICE TYPE Receipt | | NOTICE DATE February 05, 2021 |
| CASE TYPE I-485, Application to Register Permanent Residence or Adjust Status | | USCIS ALIEN NUMBER A200998492 |
| RECEIPT NUMBER MSC2190759461 | RECEIVED DATE December 29, 2020 | PAGE 1 of 1 |
| PRIORITY DATE March 07, 2011 | PREFERENCE CLASSIFICATION Alien worker, Form I-140 | DATE OF BIRTH [REDACTED] |
| MALYADRI PALURI 1320 42ND PLAZA APT 12 WEST DES MOINES, IA 50266 | | PAYMENT INFORMATION: Application/Petition Fee: \$1,140.00 Biometrics Fee: \$85.00 Total Amount Received: \$1,225.00 Total Balance Due: \$0.00 |
|  | | |
| NAME AND MAILING ADDRESS | | |
| <p>We have received your form and are currently processing the above case. If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.</p> <p>If we determine you must submit biometrics, we will mail you a biometrics appointment notice with the time and place of your appointment.</p> <p>If we have approved or are still processing your underlying Form I-140 and your Form I-485 has been pending for at least 180 days, you may request to change employers under INA 204(j). For more information on this process, please visit uscis.gov/i-485supj.</p> <p>If you have questions or need to update your personal information listed above, please visit the USCIS Contact Center webpage at uscis.gov/contactcenter to connect with a live USCIS representative in English or Spanish.</p> | | |
| USCIS Office Address: USCIS National Benefits Center P.O. Box 648003 Lee's Summit, MO 64002 | | USCIS Contact Center Number: (800)375-5283  |

Exhibit E

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.



| | | |
|---|--|--|
| NOTICE TYPE Receipt | | NOTICE DATE February 05, 2021 |
| CASE TYPE I-485, Application to Register Permanent Residence or Adjust Status | | USCIS ALIEN NUMBER A219767113 |
| RECEIPT NUMBER MSC2190759458 | RECEIVED DATE December 29, 2020 | PAGE 1 of 1 |
| PRIORITY DATE | PREFERENCE CLASSIFICATION Alien worker, Form I-140 | DATE OF BIRTH [REDACTED] |
| MADHAVI L. RAMANA 1320 42ND PLAZA APT 13 WEST DES MOINES, IA 50266  | | PAYMENT INFORMATION: Application/Petition Fee: \$1,140.00 Biometrics Fee: \$85.00 Total Amount Received: \$1,225.00 Total Balance Due: \$0.00 |
| NAME AND MAILING ADDRESS | | |
| <p>We have received your form and are currently processing the above case. If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.</p> <p>If we determine you must submit biometrics, we will mail you a biometrics appointment notice with the time and place of your appointment.</p> <p>If you have questions or need to update your personal information listed above, please visit the USCIS Contact Center webpage at uscis.gov/contactcenter to connect with a live USCIS representative in English or Spanish.</p> | | |
| USCIS Office Address: USCIS National Benefits Center P.O. Box 648003 Lee's Summit, MO 64002 | | USCIS Contact Center Number: (800)375-5283  |

Exhibit F